

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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**LeMond Cycling, Inc.,**

**Case No. 0:08-CV-1010 (RHK/JSM)**

**Plaintiff,**

**v.**

**Trek Bicycle Corporation,**

**Defendant.**

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**DECLARATION OF DENISE S. RAHNE**

I, Denise Rahne, being first duly sworn upon oath, depose and state as follows:

1. I am an attorney representing LeMond Cycling, Inc. (LeMond Cycling). I make this Declaration on personal knowledge and in support of LeMond Cycling's Memorandum of Law in Opposition to Trek's Motion to Transfer.

2. Attached to this Declaration as Exhibit 1 is a true and correct copy of the Media Advisory dated April 7, 2008 that was distributed in advance of Trek's April 8, 2008 employee meeting.

3. Attached to this Declaration as Exhibit 2 is a true and correct copy of Trek's Media Advisory Reminder/Update dated April 7, 2008 that was distributed in advance of Trek's April 8, 2008 employee meeting.

4. Attached to this Declaration as Exhibit 3 is a true and correct copy of *Imation Corp. v. Sterling Diagnostic Imaging*, No. 97-2475, 1998 U.S. Dist. LEXIS 16859 (D. Minn. Apr. 21, 1998).

5. Attached to this Declaration as Exhibit 4 is a true and correct copy of *Pragmatic C Software Corp. v. Antrim Design Sys.*, No. 02-2595, 2003 U.S. Dist. LEXIS 1824 (D. Minn. Jan. 28, 2003).

6. Attached to this Declaration as Exhibit 5 is a true and correct copy of *Facilitec Corp. v. Omni Containment Sys., L.L.C.*, No. 03-3187, 2003 U.S. Dist. LEXIS 13250 (D. Minn. July 31, 2003).

7. Attached to this Declaration as Exhibit 6 is a true and correct copy of *Caddy Prods. v. Am. Seating Co.*, No. 05-800, 2005 U.S. Dist. LEXIS 21871 (D. Minn. Sept. 28, 2005).

8. Attached to this Declaration as Exhibit 7 is a true and correct copy of *Ahlstrom v. Clarent Corp.*, No. Civ. 02-780, 2002 WL 31856386 (D. Minn. Dec. 19, 2002).

9. Attached to this Declaration as Exhibit 8 is a true and correct copy of *Northwest Airlines, Inc. v. Filipas*, No. 07-4803 (JNE/JJG), 2008 U.S. Dist. LEXIS 31084 (D. Minn. Apr. 15, 2008).

10. Attached to this Declaration as Exhibit 9 is a true and correct copy of *Ecolab Inc. v. S&L Enters.*, 2005 U.S. Dist. LEXIS 16998 (D. Minn. Aug. 12, 2005).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of May 2008.

s/Denise S. Rahne  
Denise S. Rahne